

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Minnesota Chamber of Commerce, a	)	
<i>Minnesota nonprofit corporation,</i>	)	Case No.: 0:23-cv-02015
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
John Choi, in his official capacity as	)	
County Attorney for Ramsey County,	)	
Minnesota; George Soule, in his official	)	
capacity as Chair of the Minnesota	)	
Campaign Finance and Public Disclosure	)	
Board; David Asp, in his official capacity	)	
as Vice Chair of the Minnesota Campaign	)	
Finance and Public Disclosure Board;	)	
Carol Flynn, in her official capacity as	)	
Member of the Minnesota Campaign	)	
Finance and Public Disclosure Board;	)	
Margaret Leppik, in her official capacity	)	
as Member of the Minnesota Campaign	)	
Finance and Public Disclosure Board;	)	
Stephen Swanson, in his official capacity	)	
as Member of the Minnesota Campaign	)	
Finance and Public Disclosure Board; and	)	
Faris Rashid, in his official capacity as	)	
Member of the Minnesota Campaign	)	
Finance and Public Disclosure Board,	)	
	)	
Defendants	)	
	)	

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**SUPPLEMENTAL  
DECLARATION OF THOMAS H.  
BOYD IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT**

I, Thomas H. Boyd, hereby declare:

1. I am a Shareholder with the law firm of Winthrop & Weinstine, P.A., and I am one of the attorneys of record in this matter for Plaintiff Minnesota Chamber of Commerce (“Chamber”).

2. A true and correct copy of Jeffery Sigurdson's signed errata sheet to his deposition is attached hereto as **Exhibit A**.

3. A true and correct copy of a bates labeled document CHAMBER000340 is attached hereto as **Exhibit B**.

4. A true and correct copy of excerpts from the January 8, 2024 deposition of Jeffrey Sigurdson are attached hereto as **Exhibit C**.

I DECLARE ON THE PENALTY OF PERJURY THAT THE ABOVE IS TRUE AND CORRECT. Signed and stated in the County of Hennepin, in the State of Minnesota.

Dated: September 6, 2024

*s/Thomas H. Boyd*  
Thomas H. Boyd

29682949v2

**Exhibit A**

## ERRATA SHEET

2 Case Name: MN Chamber of Commerce v. Choi, et al.

3 Date of Deposition: January 8, 2024

4 Deponent's Name: Jeffrey Sigurdson

Page/Line	Correction or Change	Reason
5		

Page 115 Line 21 I believe I said "used for the contribution" the court reporter heard "rules for the contribution".

10 \_\_\_\_\_

11 \_\_\_\_\_

12 \_\_\_\_\_

13 \_\_\_\_\_

14 \_\_\_\_\_

15 \_\_\_\_\_

16 \_\_\_\_\_

17 \_\_\_\_\_

18 \_\_\_\_\_

20 I, Jeff Sigurdson have read the  
(print your name)  
21 transcript and request these changes be noted for the  
reasons indicated.

23 Date: 1/25/2024 Sig.: JH Johnson  
24 INSTRUCTIONS: Return this signed sheet to Counsel within  
25 30 days of the final transcript notification email and  
send a copy to our court reporting office:  
[erratas@myrina.com](mailto:erratas@myrina.com).

**Exhibit B**

Message

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**From:** Bordelon, Laura [lbordelon@mnchamber.com]  
**Sent:** 8/27/2024 10:30:43 AM  
**To:** Halloran, Cianna [CHalloran@winthrop.com]  
**Subject:** FW: Pro Jobs deposit

FYI

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**From:** Kojetin, Annette <AKojetin@mnchamber.com>  
**Sent:** Tuesday, August 27, 2024 10:30 AM  
**To:** Bordelon, Laura <lbordelon@mnchamber.com>  
**Cc:** Loon, Doug <dloon@mnchamber.com>; Cook, Brian <bcook@mnchamber.com>; Farrell, Amanda <AFarrell@mnchamber.com>  
**Subject:** RE: Pro Jobs deposit

Transfer completed.

~Annette



ANNETTE KOJETIN, CPA  
*Vice President, Chief Financial Officer*

380 St. Peter Street, Suite 1050, St. Paul, MN 55102  
P: 651.292.4687 C: 612.816.0841  
[www.mnchamber.com](http://www.mnchamber.com)

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**From:** Bordelon, Laura <lbordelon@mnchamber.com>  
**Sent:** Tuesday, August 27, 2024 10:24 AM  
**To:** Kojetin, Annette <AKojetin@mnchamber.com>  
**Cc:** Loon, Doug <dloon@mnchamber.com>; Cook, Brian <bcook@mnchamber.com>  
**Subject:** Pro Jobs deposit

Annette – please transfer \$250,000 from the Chamber to Pro Jobs Majority. Doug has approved.

Thank you.



LAURA BORDELON  
*Senior Vice President, Advocacy*

380 St. Peter St., Suite 1050, St. Paul, MN 55102  
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**Exhibit C**

1           the question is 7, parenthetical (b)?

2           MR. BOYD: Yes.

3           MS. KIMBLE: I think that's clear. Thank  
4           you.

5           MR. BOYD: Yeah. No. Thank you.

6 BY MR. BOYD:

7 Q       Subdivision 7(b), referencing knowingly violating the  
8       section, would your answer be the same, Mr. Sigurdson?

9 A       Yes.

10 Q      All right. As I understand it, under Minnesota Statute  
11     10A.022, subdivision 7, "A matter that is under the  
12     board's jurisdiction pursuant to that section that may  
13     result in a criminal offense must finally be disposed of  
14     by the board before the alleged violation may be  
15     prosecuted by a city or county attorney." Is that  
16     correct?

17 A       Yes.

18 Q      So with regard to a Subdivision 6(b) and Subdivision  
19     7(b) of Chapter 211B.15, would the board need to finally  
20     dispose of its investigation and make a determination as  
21     to any enforcement before the county prosecutor could  
22     pursue a criminal prosecution for any violation of the  
23     statute?

24 A      I would word it a little differently. My understanding  
25     is that the board cannot refer any matter to the county

1 attorney under those two provisions prior to finishing  
2 its own investigation. I don't believe it necessarily  
3 prevents someone from filing a complaint directly with  
4 the county attorney, but I don't believe the board could  
5 refer a matter until it had closed its own  
6 investigation.

7 Q So again referencing to Minnesota Statute 10A.022,  
8 subdivision 7, that provision of statute restricts the  
9 authority of the board to make a referral to a county or  
10 city prosecutor, but it does not restrict the county or  
11 city prosecutor from taking action on its own; is that  
12 correct?

13 A That's my understanding, yes, sir.

14 Q Okay. Based on that understanding, would it be your  
15 view that a county prosecutor could initiate an  
16 investigation and a potential criminal prosecution for  
17 violation of 211B.15, Subdivision 6(b) or Subdivision  
18 7(b) without the requirement of a referral from the  
19 board?

20 MS. KIMBLE: Objection. Legal  
21 conclusion.

22 You can answer.

23 A That's my understanding, sir.

24 BY MR. BOYD:

25 Q Thank you.

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Case No.: 0:23-cv-02015 (ECT/DJF)

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Minnesota Chamber of Commerce, a Minnesota  
nonprofit corporation,

Plaintiff,

v.

John Choi, in his official capacity as County Attorney  
for Ramsey County, Minnesota; George Soule, in his  
official capacity as Chair of the Minnesota Campaign  
Finance and Public Disclosure Board; David Asp, in his  
official capacity as Vice Chair of the Minnesota  
Campaign Finance and Public Disclosure Board; Carol  
Flynn, in her official capacity as Member of the  
Minnesota Campaign Finance and Public Disclosure Board;  
Margaret Leppik, in her official capacity as Member of  
the Minnesota Campaign Finance and Public Disclosure  
Board; Stephen Swanson, in his official capacity as  
Member of the Minnesota Campaign Finance and Public  
Disclosure Board; and Faris Rashid, in his official  
capacity as Member of the Minnesota Campaign Finance and  
Public Disclosure Board,

Defendants.

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Deposition of

JEFFREY SIGURDSON

Monday, January 8, 2024

9:05 a.m.

Court Stenographer:  
Myrina A. Kleinschmidt, RMR, CRR, CRC